

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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USDC SDNY
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RAMON MODESTO
Plaintiff,

15-CV-00495 (KNF)(RA)

NOTICE OF MOTION

-against-

HECTOR FIGUEROA , et. al.
Defendants,

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PLEASE TAKE NOTICE that upon the annexed affirmation of Ramon Modesto, affirmed on September 22, 2015, and upon the exhibits attached thereto, the accompanying Memorandum Of Law in support of this Motion, and the pleadings herein, plaintiff will move this Court, before Kevin Nathaniel Fox, United States Magistrate Judge, for an order pursuant to the Federal Rules on Civil Procedure granting that the Motion to Dismiss filed by individual defendants of Securitas, Union, and FQM be DENIED.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 22, 2015
New York, New York

Ramon Modesto
Ramon Modesto
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